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9
10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 RICKY BELLMAN, an individual;

13 Plaintiff,

14 vs.

15 WILLIAM GLEN VAUGHN, an individual;
16 SPRINTER TRUCKING, INC., an Oregon
17 foreign corporation; and DOES 1 through 20,
18 inclusive;

19 Defendants.

20 Case No.: 2:25-cv-00955-APG-BNW

21 **STIPULATION AND ORDER TO EXTEND**
22 **DISCOVERY**
23 **(SECOND REQUEST)**

24 Pursuant to Federal Rule of Civil Procedure 26(f) and District of Nevada Civil Local Rules 6-1
25 and 26-3 and for good cause described herein, Plaintiff, RICKY BELLMAN (hereinafter "Plaintiff"), by
26 and through his attorney of record, The Bourassa Law Group, and Defendants, WILLIAM GLEN
27 VAUGHN and SPRINTER TRUCKING, INC. (hereinafter collectively "Defendants"), by and through
28 their counsel of record Phillips, Spallas & Angstadt, LLC, hereby request this Honorable Court to adopt
and approve this stipulated extension to the discovery plan and continue the discovery deadlines for ninety
(90) days as requested herein:

29 **I. LOCAL RULE 6-1 IS SATISFIED**

30 This is the first request for an extension of discovery deadlines filed by the parties. Pursuant to
31 the Order dated August 28, 2025 the following dates govern for purposes of discovery:

32 1. Discovery Cutoff Date: February 23, 2026
33 2. Motions to Amend Pleadings and Add Parties: August 28, 2025

3. Expert Designations:	December 2, 2025
4. Rebuttal Expert Designations:	January 23, 2026
5. Dispositive Motions:	March 27, 2026
6. Joint Pre-Trial Order:	April 27, 2026

The parties have been diligently pursuing discovery on all aspects of the case and are working in good faith to reach an amicable resolution. Currently, the expert deadlines are in less than forty-five (45) days. The parties agree that the expense of completing expert reports would make resolution of the matter prohibitive. Accordingly, the parties request that the court stay all deadlines until March 2, 2026.

The instant request comports with Local Rule 6-1 in that no request is being made after the expiration of the specified period.

II. LOCAL RULE 26-3 IS SATISFIED

The instant request to extend discovery deadlines satisfies the requisites of Local Rule 26-3. This request is made within twenty-one (21) days of the subject deadline and is supported by a showing of good cause.

The parties agree that the extension requested is made in good faith and will allow for additional fact discovery to be completed before the upcoming proposed deadlines. As a result, the parties have requested the remaining discovery deadlines be extended ninety (90) days.

Discovery Completed to Date

1. Plaintiff's Initial Disclosures:	May 23, 2025
a. Plaintiff's First Supplemental Disclosures:	August 8, 2025
2. Defendant's Initial Disclosures:	June 25, 2025
3. Plaintiff Served Written Discovery Requests:	August 1, 2025
a. Defendants Responded to Written Discovery Requests:	September 2, 2025
4. Defendants Served Written Discovery Requests:	July 3, 2025
a. Plaintiff Responded to Written Discovery Requests:	August 8, 2025

Discovery Remaining

The parties need to prepare expert reports, rebuttal reports, and take the depositions of those experts.

Proposed Schedule for Completing All Remaining Discovery

Finally, under Local Rule 26(4), it is necessary to articulate a proposed schedule for completing all remaining discovery. The parties are requesting an additional ninety (90) days be afforded for discovery. The following deadlines are requested:

1. Discovery Cutoff Date:	May 26, 2025
2. Motions to Amend Pleadings and Add Parties:	August 28, 2025 (no change)
3. Expert Designations:	March 2, 2026
4. Rebuttal Expert Designations:	April 23, 2026
5. Dispositive Motions:	June 25, 2026
6. Joint Pre-Trial Order:	July 27, 2026

If this extension is granted, all anticipated additional discovery should be concluded within the stipulated extension deadline. The parties aver that this request for extension of discovery deadlines is made by the parties in good faith and not for the purpose of delay.

DATED this 21st day of November, 2025.

DATED this 21st day of November, 2025.

THE BOURASSA LAW GROUP

PHILLIPS, SPALLAS & ANGSTADT, LLC

By: /s/ Mark J. Bourassa
MARK J. BOURASSA, ESQ. (NBN 7999)
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Attorney for Plaintiff

By: /s/ Baylie A. Hellman
ROBERT K. PHILLIPS (NBN 14411)
TIMOTHY D. KUHLS (NBN 13362)
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504 South Ninth Street
Las Vegas, Nevada 89101

IT IS SO ORDERED:

Barbweber
UNITED STATES MAGISTRATE JUDGE

DATED: November 24, 2025

CASE NO.: 2:25-cv-00955-APG-BNW

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of The Bourassa Law Group, and that on this date I caused to be served a true copy of **STIPULATION AND ORDER TO EXTEND DISCOVERY** on all parties to this action by the method(s) indicated below:

X by using the Court's CM/ECF Electronic Notification System addressed to:

Robert K. Phillips, Esq.
Timothy D. Kuhls, Esq.
Baylie A. Hellman, Esq.
PHILLIPS, SPALLAS, & ANGSTADT LLC
504 South Ninth Street
Las Vegas, Nv 89101

DATED: This 21st day of November 2025.

/s/ Alyssa Rust
Employee of The Bourassa Law Group